

# EXHIBIT A

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

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DARRYL ASHMORE,

Plaintiff,

vs.

Case No. 9:16-cv-81710-KAM

NFL PLAYER DISABILITY &  
NEUROCOGNITIVE BENEFIT PLAN,

Defendant.

**DECLARATION OF HESSAM (“SAM”) VINCENT**

I, Hessam Vincent, declare the following:

1. I am over the age of 18, and I am otherwise fully competent to testify to the matters stated in this Declaration.

2. I work within the NFL Player Benefits Office in Baltimore, Maryland. I am the Disability Manager for the NFL Player Disability & Neurocognitive Benefit Plan (the “Plan”).

3. In my role as Disability Manager, I generally help Players file applications for disability benefits, as necessary; I help coordinate medical examinations of Players with the Plan’s neutral physicians, as necessary; and I am primarily responsible for maintaining the files and records relating to Player applications.

4. As the Disability Manager, I also supervise the preparation of disability application-related materials for presentation to the Plan’s administrator, the Disability Board.

5. The members of the Disability Board do not have offices within the NFL Player Benefits Office in Baltimore, Maryland.

6. The members of the Disability Board meet on a quarterly basis, at various locations convenient to the members. The Disability Board held its August 2016 meeting, for example, in San Francisco, California.

7. In advance of each quarterly meeting of the Disability Board, NFL Player Benefits Office staff, working under my supervision, prepare all pertinent application-related materials submitted to the NFL Player Benefits Office for presentation to and consideration by the Disability Board.

8. To aid in this process, we ordinarily ask Players to submit any application-related materials to the NFL Player Benefits Office at least 30 days in advance of each quarterly Disability Board meeting.

9. In advance of the Disability Board's August 2016 meeting, NFL Player Benefits Office staff prepared the materials related to Mr. Ashmore's disability application for presentation to and consideration by the Disability Board.

10. I have reviewed Exhibit F and Exhibit G to Plaintiff's motion for summary judgment, and I have confirmed that those materials were not prepared for or presented to the Disability Board in conjunction with its August 17, 2016 decision on Mr. Ashmore's application for disability benefits.

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: November 9<sup>th</sup>, 2017

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es in Vincent